Comments regarding the proposed use of BPL.

The technical evidence clearly indicates that the radiated signals from BPL do indeed pose a serious potential interference problem to amateur radio operations on those frequencies where the BPL signals appear. The evidence from numerous sources has been presented and I doubt can be refuted – the potential for BPL signal radiation can cause serions and debilitating interference to amateur radio communications being conducted in the 1.8 – 50 MHz amateur frequencies.

Proponents of the system say it will bring internet service to those who don't have it – and yet those companies providing internet access are in an over-built situation where they are not getting enough subscribers. Unless internet access is to be offered at little or no cost, I question the marketing research the proponents have done to indicate what the market for such a service will be.

Reliance on commercial power and commercial means of communication during an emergency or disaster is bad practice as the terrible 9/11 incident showed. Cell phone, regular telephone communications and electric power were cut for a considerable time. Amateur radio was a vital link in providing communications during those early days of recovery.

I would like to address my comments to the impact of such interference on amateur operations. In a just sighed agreement between the American Radio Relay League (ARRL) and the Citizen Corps. Chief Operating Officer of the Emergency Preparedness and Response Directorate (FEMA) Ron Castleman represented Under Secretary for Emergency Preparedness and Response Michael D. Brown at the signing. Citizen Corps Liaison to the White House Liz DiGregorio called ham radio operators the "first of the first responders."

What could be more of an impediment to the performance of emergency communications that a contact barrage of digital pulses covering the amateur bands? Given the very nature of emergency communications, low and inefficient antennas may be employed along with low power all adding up to a higher probability that signals will not be heard. This is not a good situation.

FCC Part 15 rules require that the operator of an unlicensed emitter not cause harmful interference to authorized radio services. The absolute emission limits and the non-interference rule work together to allow most unlicensed devices to operate without causing widespread interference.

BPL is different from point-source emitters, however. Access BPL systems are not local in nature. They are expected to occupy entire communities. BPL systems do not create "birdies" on specific frequencies. They create radiated emissions at the FCC limits on entire swaths of spectrum.

If interference occurs from localized "unintentional radiator" sources such as power line noise, solutions exist. For example, power companies can change cracked insulators. The FCC has been able to enforce these rules when necessary. Indeed, a number of electric utilities have received letters from the FCC, as have the neighbors of hams who own and operate noisy Part 15 devices.

In the case of access BPL, if an amateur doesn't have the broadband system installed in his or her own house but experiences interference from signals radiated via the overhead electrical wiring, the only real solution could be to turn off the BPL system in entire neighborhoods. As a practical matter, that is unlikely to occur.

To overcome (or at least to attempt to overcome) the interference, amateurs will have to increase the level of power used to make their signal heard at or above the noise level, increasing power levels. The increased amateur power level, in turn, could cause interference with the BPL transmissions, resulting in complaints from users.

Given the poor record of accomplishment that electric companies have of handling and resolving interference complaints by amateurs and their lack of attention to these matters in favor of those that have a

higher payback, I am greatly concerned that they will not be able to resolve or properly handle BPL interference complaints.

Speaking of poor track records, the Commission itself has not done a very good job of controlling violations either. With all due praise for the efforts of Mr. Hollingsworth, he is but one man – we need the teeth and claws of the Commission to deal with violations. How will BPL violations be handled given the current level of enforcement?

If BPL goes forward and this genie is let out of the box, it will signal the death knell for some if not many amateur radio activities such as QRP, low power operating, weak signal detection and operating. In fact, it may well be the end for amateur radio operation on the 1.8 – 50 MHz bands entirely.

I sincerely request the commission listen and heed the recommendations being made by the ARRL and others who have had both the technical and operating experience with BPL and to know the negative impact it represents.

In short, please don't allow it, please don't permit it to go forward. Please control it so it does not harm amateur and other radio services, please encourage other means of achieving wide-spread internet access without sacrificing a most valuable and precious resource that is ready, willing and able to provide communications as and when needed in time of peace, disaster and even war should it be deemed necessary.

Sincerely,

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